

EXHIBIT 2

Privacy Litigation

Security breach notification laws require entities to notify their customers or citizens when they have experienced a data breach and to take certain steps to deal with the situation. This gives these individuals the opportunity to mitigate personal risks resulting from the breach and minimize potential harm, such as fraud or identity theft. Currently, all 50 states, along with the District of Columbia and three U.S. territories, have adopted notification laws requiring notification when a breach has occurred.

- **In re: Anthem, Inc. Data Breach Litig., MDL 2617 LHK** (N.D. California, 2016). The firm served as counsel for plaintiffs in a coordinated action consisting of nationwide cases of consumers harmed by the 2015 criminal hacking of servers of Anthem, Inc. containing more than 37.5 million records on approximately 79 million people receiving insurance and other coverage from Anthem's health plans. The case settled in 2017 for \$115 million, the largest healthcare data breach in U.S. history, and has received final approval.
- **In re: McKenzie et al. v. Allconnect, Inc., 5:18-cv-00359** (E.D. Kentucky) (J. Hood). The firm served as class counsel in an action brought on behalf of more than 1,800 current and former employees of Allconnect, Inc., whose sensitive information contained in W-2 statements was disclosed to an unauthorized third party who sought the information through an email phishing scheme. The firm negotiated a settlement providing for direct cash payments to all class members, credit monitoring and identity theft protection plan at no cost, capped reimbursement of documented economic losses incurred per class member and other remedial measures. The approximately \$2.2 million settlement value is one of the largest per capita recoveries in a W-2 phishing litigation.
- **In re: Monegato v. Fertility Centers of Illinois, PLLC, Case No. 2022 CH 00810** (Cook County Circuit Court). The firm served as class counsel in a case brought on behalf of approximately 80,000 individuals whose personal information was involved in a February 2021 data breach. A settlement with a total estimated value of \$14.5 million was negotiated. Final approval was granted by the Cook County, Illinois Circuit Court in April 2023.
- **In re: Winsouth Credit Union v. Mapco Express Inc., and Phillips v. Mapco Express, Inc. Case Nos. 3:14-cv-1573 and 1710** (M.D. Tennessee) (J. Crenshaw). The firm served as liaison counsel in consumer and financial institution action stemming from the 2013 hacking of computer systems maintained by Mapco Express, Inc. The cases settled in 2017 for approximately \$2 million.
- **In re: Owens, et al. v. U.S. Radiology Specialists, et al., Case No. 22 CVS 17797** (Mecklenburg, North Carolina, Supreme Court). The firm served as plaintiffs' counsel in action brought on behalf of approximately 1.3 million individuals whose sensitive, personal information was potentially compromised in defendants' December 2021 data security incident. Along with co-counsel, the firm negotiated a \$5,050,000 non-reversionary common fund settlement including pro rata cash payments, reimbursement of up to \$5,000 for out-of-pocket expenses traceable to the data breach per person, compensation for lost time and verified fraud reimbursement. Preliminary approval pending.

Many more nationwide, including:

- **In re: Larson v. Aditi Consulting, LLC, Case No. 22-2-03572-2 SEA** (King County, Washington, Supreme Court). Final approval was granted July 14, 2023.
- **In re: Carr v. South Country Health Alliance, Case No. 74-CV-21-632** (Steele County, Minnesota District Court). Final approval was granted Nov. 6, 2023.
- **In re: Reese v. Teen Challenge Training Center, Inc., Case No. 210400093** (Philadelphia County, Pennsylvania Court of Common Pleas). Final approval pending.
- **In re: Joyner v. Behavioral Health Network, Inc., No. 2017CV00629** (Massachusetts Supreme Court). A non-reversionary common fund of \$1,200,000 was established to provide credit monitoring, and cover claims of economic loss up to \$10,000 and non-economic loss up to \$1,000 for lost time for each of the approximately 133,237 class members.

ATTORNEYS IN THIS PRACTICE AREA



Colleen Garvey



Andrew E. Mize



Emily E. Schiller



Miles M. Schiller



J. Gerard Stranch IV



Grayson Wells

Class Action

Our firm has a long record of success representing plaintiffs in a substantial number of class action and mass tort cases in state and federal courts throughout the U.S. These cases include some of the most complicated litigation the courts have seen against some of the largest multinational companies. Through these cases, we defend the rights of clients harmed by defective products, pharmaceuticals, industry negligence or illegal practices.

Our attorneys have served as class counsel and as lead, co-lead and liaison counsel in landmark cases and national class actions involving data breach, wage and hour violations, anti-competitive practices, illegal generic drug suppression and bid rigging, defective products and violations of the Telephone Consumer Protection act.

- **In re: Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation, MDL No. 2672 CRB** (N.D. California) (J. Breyer). Founding and Managing Member J. Gerard Stranch IV served on the plaintiffs’ steering committee in a coordinated action consisting of nationwide cases of consumer and car dealerships. This action alleged that Volkswagen AG, Volkswagen Group of America and other defendants illegally installed so-called “defeat devices” in their vehicles, which allowed the cars to pass emissions testing but enabled them to emit nearly 40 times the allowable pollution during normal driving conditions. In October 2016, the court granted final approval to a settlement fund worth more than \$10 billion to consumers with two-liter diesel engines, and in May 2017, the court granted final approval to a \$1.2 billion settlement for consumers with three-liter diesel engines, and a \$357 million settlement with co-defendant Bosch.
- **In re: Davidson v. Bridgestone/Firestone, Inc. and Ford Motor Co. No. 00-C2298** (Davidson Circuit, Tennessee) (Solomon/Brothers). The firm served as lead counsel in a nationwide class action against Bridgestone/Firestone, Inc. and Ford Motor Co. concerning defective tires. A settlement valued at \$34.4 million was reached in conjunction with a companion case in Texas.
- **In re: Cox v. Shell Oil et al., Civ. No. 18844** (Weakley Chancery, Tennessee) (Judge Malon). The firm intervened in a consumer class action composed of all persons throughout the United States who owned or purchased defective polybutylene piping systems used in residential constructions or mobile homes. A global settlement was reached that was valued at \$1 billion.
- **In re: Heilman et al. v. Perfection Corporation, et al., Civ. No. 99-0679-CD-W-6** (W.D. Missouri). The firm served on the executive committee in a nationwide consumer class action composed of all owners or purchasers of a defective hot water heater. A settlement was reached that provided 100% recovery of damages for a possible 14.2 million hot water heaters and any other property damages.
- **In re: Alpha Corp. Securities litigation.** Founding and Managing Member J. Gerard Stranch IV was appointed as co-lead counsel. The case resulted in a \$161 million recovery for the class.

ATTORNEYS IN THIS PRACTICE AREA



Colleen Garvey



Hon. John (Jack) Garvey



Michael Iadevaia



Kyle C. Mallinak



Nathan Martin



Andrew E. Mize



Emily E. Schiller



Miles M. Schiller



Marty Schubert



Michael G. Stewart



J. Gerard Stranch IV



James G. Stranch III



K. Grace Stranch



Grayson Wells



J. Gerard Stranch IV

FOUNDING AND MANAGING MEMBER

Gerard Stranch is the managing member at Stranch, Jennings & Garvey, PLLC (SJ&G). A third-generation trial lawyer, he leads the firm's class action and mass tort practice groups. His additional areas of practice include bank fees, data breaches, wage and hour disputes, worker adjustment and retraining notification, personal injury and trucking wrecks.

Mr. Stranch has served as lead or co-lead counsel for the firm in numerous cases, including:

- lead trial attorney in the Sullivan Baby Doe case (originally filed as Staubus v. Purdue) against U.S. opioid producers Endo Health Solutions Inc. and Endo Pharmaceuticals Inc., resulting in a \$35 million settlement agreement, the largest per capita settlement achieved by any prosecution with Endo to date;
- personally appointed to the steering committee of the In re: Volkswagen "Clean Diesel" Marketing, Sales Practices and Products Liability Litigation, resulting in approximately \$17 billion in settlements, the largest consumer auto settlement and one of the largest settlements in any matter ever;
- the executive committee In re: Dahl v Bain Capital Partners (anti-trust), resulting in a \$590.5 million settlement;
- personally appointed to the steering committee In re: New England Compounding Pharmacy, Inc., resulting in more than \$230 million in settlements; and
- appointed as co-lead counsel In re: Alpha Corp. Securities litigation, resulting in a \$161 million recovery for the class.

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LOCATION

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A 2000 graduate of Emory University, Mr. Stranch received his J.D. in 2003 from Vanderbilt University Law School, where he teaches as an adjunct professor about the practice of civil litigation. He led the opioid litigation team in the Sullivan Baby Doe suit, for which the team won the 2022 Tennessee Trial Lawyer of the Year award. Mr. Stranch has been listed as one of the Top 40 Under 40 by the National Trial Lawyers Association and as a Mid-South Rising Star by Super Lawyers magazine.

PRACTICE AREAS

- Class Action
- Mass Tort
- Bank Fees
- Data Breaches
- Wage and Hour Disputes
- Worker Adjustment and Retraining Notification
- Personal Injury
- Trucking Wrecks

EDUCATION

- Vanderbilt University Law School (J.D., 2003)
- Emory University (B.A., 2000)

BAR ADMISSIONS

- Tennessee
- U.S. District Court Western District of Tennessee
- U.S. District Court Middle District of Tennessee
- U.S. District Court Eastern District of Tennessee
- U.S. 6th Circuit Court of Appeals
- U.S. 8th Circuit Court of Appeals
- U.S. 9th Circuit Court of Appeals
- U.S. District Court District of Colorado

PROFESSIONAL HONORS & ACTIVITIES

Awards

- Super Lawyers Mid-South Rising Star
- Tennessee Trial Lawyer of the Year
- Top 40 Under 40, National Trial Lawyers Association

Memberships

- Public Justice
- Nashville Bar Association
- Tennessee Bar Association
- American Association for Justice
- Tennessee Association for Justice
- Lawyer's Coordinating Committee of the AFL-CIO
- General Counsel Tennessee AFL-CIO and Federal Appointment, Coordinator
- General Counsel Tennessee Democratic Party
- National Trial Lawyer
- Board of Directors, Cumberland River Compact
- Board of Governors, Tennessee Trial Lawyers Association

PRESENTATIONS

- Mr. Stranch regularly speaks at conferences on issues ranging from in-depth reviews of specific cases to developments in the law, including in mass torts, class actions and voting rights.
- Mr. Stranch is one of the founding members of the Cambridge Forum on Plaintiff's Mass Tort Litigation and regularly presents at the forum.

LANGUAGES

- English
- German

SJG
STRANCH,
JENNINGS
& GARVEY
PLLC



Grayson Wells

ATTORNEY

Grayson Wells joined Stranch, Jennings & Garvey in early 2024. He specializes in complex civil litigation, including data breach and privacy class actions in both state and federal court.

Prior to joining the firm, Mr. Wells served as a litigation associate at the Nashville office of Bradley Arant Boult Cummings LLP. After earning his law degree from Indiana University Maurer School of Law in 2020, Mr. Wells served for two years as a law clerk to the Honorable Iain D. Johnston, U.S. District Judge for the Northern District of Illinois.

Before becoming a lawyer, Mr. Wells spent more than a decade as a network infrastructure engineer, both in the military and the private sector. In addition to his law degree, he received a master of science degree in cybersecurity risk management from Indiana University and a bachelor of science in computer science from Park University.

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PRACTICE AREAS

- Class Action
- Civil Litigation
- Privacy Litigation
- Cybersecurity Litigation

EDUCATION

- Indiana University Maurer School of Law (J.D., magna cum laude, 2020)
 - Executive Articles Editor, Indiana Law Journal
 - President and Founder, Cybersecurity and Privacy Law Association
 - Dean's Writing Fellow
 - Community Legal Clinic
- Indiana University (M.S. in Cybersecurity Risk Management, 2020)
- Park University (B.S. in Computer Science, summa cum laude, 2010)

CLERKSHIPS

- Hon. Iain D. Johnston, U.S. District Court, Northern District of Illinois, Western Division

BAR ADMISSIONS

- Missouri
- Tennessee
- U.S. District Court Western District of Tennessee
- U.S. District Court Middle District of Tennessee
- U.S. District Court Eastern District of Tennessee
- U.S. District Court Eastern District of Missouri
- U.S. 6th Circuit Court of Appeals

MEMBERSHIPS

- American Bar Association
- Tennessee Bar Association
- Nashville Bar Association

PRESENTATIONS AND PUBLISHED WORKS

- "What's the Harm? Federalism, the Separation of Powers, and Standing in Data Breach Litigation," Comment, 96 Ind. L.J. 937, (Spring 2021)
- "Data Security, Professional Perspective – Complying with the FTC's Amended Safeguards Rule," Bloomberg Law (Robert Maddox, Erin Illman, Courtney Achee and Grayson Wells), (June 2023)



STRANCH, JENNINGS & GARVEY

PLLC



Colleen Garvey

ATTORNEY

St. Louis native Colleen Garvey joined Stranch, Jennings & Garvey in 2022. Ms. Garvey previously worked at a top insurance defense firm in St. Louis, where she primarily practiced in premises liability, personal injury and catastrophic loss claims. She brings a unique perspective and desire to strongly advocate for those who have experienced injustice or harm.

Ms. Garvey earned her J.D. in 2020 from Saint Louis University School of Law. While attending law school, she worked as a law clerk at a plaintiff's firm for two years; served as a teaching fellow mentor for first-year law students; clerked for Judge Colleen Dolan on the Missouri Court of Appeals in the Eastern District; and, by invitation, served as a member of the prominent Theodore McMillian American Inn of Court. She also practiced as a Rule 13 certified law student for Saint Louis University's Criminal Law Clinic, representing indigent clients in criminal matters before state and federal judges.

Ms. Garvey graduated *magna cum laude* in 2016 from Rockhurst University in Kansas City, Missouri, with a B.A. in Psychology and a B.A. in English, and competed as a collegiate scholar athlete on the Rockhurst women's golf team.

Ms. Garvey resides in the City of St. Louis with her pet axolotl, Jerry. In her free time, she enjoys traveling and playing pickleball with her friends and family.

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PRACTICE AREAS

- Mass Torts
- Personal Injury
- Class Action Litigation and Complex Litigation
- General Civil Litigation
- Privacy Litigation

EDUCATION

- Saint Louis University School of Law (J.D., 2020)
- Rockhurst University (B.A., *magna cum laude*, 2016)

CLERKSHIP

- Hon. Colleen Dolan on the Missouri Court of Appeals in the Eastern District

BAR ADMISSIONS

- Missouri
- Illinois
- U.S. District Court for the Eastern District of Missouri

EXPERIENCE

Representative Case

- In re: Gill v. Abbott Laboratories, No. 2322-CC01251 (22nd Judicial Circuit Court of Missouri). A closely watched necrotizing enterocolitis (NEC) baby formula bellwether trial culminated in a \$495 million judgment against Abbott Laboratories, a verdict that could affect many other lawsuits awaiting litigation in state and federal courts throughout the U.S.

PROFESSIONAL HONORS & ACTIVITIES

Awards

- 2023 Missouri & Kansas Super Lawyers® Class Action/Mass Torts Rising Stars
- 2023 National Trial Lawyers Civil Plaintiff Top 40 Under 40 Trial Lawyers in the state of Missouri

COMMUNITY INVOLVEMENT

- Missouri State Public Defender System's Coalition for the Right to Counsel Program (*pro bono* representative, 2020 – present)



STRANCH, JENNINGS & GARVEY

PLLC



Andrew E. Mize

ATTORNEY

Andrew Mize joined Stranch, Jennings & Garvey (previously Branstetter, Stranch & Jennings) in 2021 and concentrates his practice in areas of complex civil litigation, including class actions, labor law and administrative law.

Mr. Mize has more than a decade of experience in the fields of personal injury litigation, education law and special education law, in civil rights law, including 42 U.S.C. § 1983, and in misdemeanor and felony criminal defense. Mr. Mize has represented clients in state and federal court at the trial and appellate levels, with a singular focus on obtaining the best results for clients. Prior to joining the firm, he was a partner at Gordon & Mize, LLP, in Louisville, Kentucky.

Mr. Mize graduated *cum laude* from the University of Louisville, Louis D. Brandeis School of Law in 2011, where he was a member of the University of Louisville Law Review. During law school, he was a member of Phi Alpha Delta Law Fraternity and the National Lawyers Guild, and spent his summers interning with the Kentucky Department of Public Advocacy. He earned a Bachelor of Arts from Centre College in 2008, with double majors in government and history, and double minors in international studies and political economy. While in college, he was a member of Beta Theta Pi.

Mr. Mize lives in Louisville, Kentucky, with his wife, who is an accountant. His interests include history, shooting sports, art, the outdoors and travel.

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PRACTICE AREAS

- Civil Litigation
 - Class Actions
 - Labor law
 - Personal injury
 - Education and special education law
 - Civil rights
 - Administrative law matters
- Appellate Practice
- Criminal Law

EDUCATION

- Louis D. Brandeis School of Law, University of Louisville (J.D., *cum laude*, 2011)
- Centre College, B.A. (2008)
- Culver Military Academy (2004)

BAR ADMISSIONS

- Kentucky
- U.S. District Court for the Western District of Kentucky
- U.S. 6th Circuit Court of Appeals

EXPERIENCE

Representative cases:

- Obtained reversal of District Court grant of summary judgment to defendant school board and employees in case involving disability discrimination of a child from the U.S. Court of Appeals for the Sixth Circuit, *Clemons v. Shelby Cty. Bd. of Educ.*, 19-5846, 818 Fed.Appx. 453 (6th Cir. 2020)
- Favorable resolution of medical malpractice action involving plaintiff injured during gynecological surgery, resulting in significant damages
- Highly favorable resolutions in numerous cases involving minor students injured at school due to negligence supervision, including bullying and discrimination

PROFESSIONAL HONORS & ACTIVITIES

Memberships

- Kentucky Bar Association

PRESENTATIONS, SEMINARS & PUBLISHED WORKS

- *When Lady Justice Sought Her Sight: Judicial Selection in Kentucky in Light of Recent Trends and Carey v. Wolnitzek*, 50 U. LOU. L. REV. 383 (2011).



STRANCH, JENNINGS & GARVEY



Emily E. Schiller

ATTORNEY

Before joining Stranch, Jennings & Garvey, Emily Schiller served as a federal clerk for the Hon. Rebecca Grady Jennings in the Western District of Kentucky. Prior to her two-year clerkship, she worked with her lawyer-father, where she assisted with women's civil rights litigation.

Ms. Schiller graduated from Tennessee Technological University in 2016 with two STEM degrees and a minor in history. Her first degree is in chemistry with a concentration in biochemistry, and her second is in biology with a concentration in health sciences. She earned her J.D. degree in 2021 from Washington University in St. Louis, where she served as the online content editor for the *Washington University Law Review*.

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PRACTICE AREAS

- Civil Rights
- Intellectual Property
- Class Action
- Privacy Litigation

EDUCATION

- Washington University in St. Louis School of Law (J.D., 2021)
 - Online Content Editor, *Washington University Law Review*
 - Scholar in Law Scholarship Award
 - Washington Scholarship Award
 - Dean's Scholar Award
 - Dean's Leadership Award
- Tennessee Technological University (Dual Degrees: B.S. in Chemistry, *summa cum laude, in cursu honorum* | B.S. in Biology, *summa cum laude, in cursu honorum*, 2016)
 - Captain William Lafayette Anderson Scholarship
 - Joseph B. Hix Memorial Scholarship
 - Winchester History Scholarship
 - Minor in History

BAR ADMISSIONS

- Tennessee

PROFESSIONAL HONORS & ACTIVITIES

Membership

- Tennessee Bar Association

COMMUNITY INVOLVEMENT

- tnAchieves Mentor
- Washington University in St. Louis School of Law Pro Bono Pledge Award
- STEM Outreach events
- Senior citizen technology outreach

PRESENTATIONS, SEMINARS & PUBLISHED WORKS

Presentations

- "Law School and Judicial Clerking: An Overview," Tennessee Technological University (2023)
- "Investigation of the Shape of Atrope Isomers using Dipolar Couplings," Poster session presented at the 251st American Chemical Society National Meeting & Exposition, San Diego, California (2016)
- "The Organic Molecule Synthesis for Use in the Investigation of Atrope Isomer Shapes," Poster session presented at 2015 SERMACS – SWRM, ACS Regional Meeting, Memphis, Tennessee (2015)
- "Differences in Proton NMR Spectra of Methane and Ethane in Varying Solution," Poster session presented at the 249th ACS National Meeting & Exposition, Denver, Colorado (2015)

Published Works

- Donald Walker, Emily E. Schiller et al., *Methodological Considerations for Detection of Terrestrial Small-Body Salamander eDNA and Implications for Biodiversity Conservation, Molecular Ecology Resources*, Nov. 2017, at 1223. doi: 10.1111/1755-0998.12667



STRANCH, JENNINGS & GARVEY



Miles M. Schiller

ATTORNEY

Before joining Stranch, Jennings & Garvey in 2024, Miles Schiller served as a federal clerk for the Hon. Rebecca Grady Jennings in the Western District of Kentucky. Prior to his clerkship, he worked with his lawyer-father, where he assisted with women's civil rights litigation. He also worked with a prominent medical malpractice plaintiff's firm in Knoxville, Tennessee.

Mr. Schiller graduated from Tennessee Technological University in 2019 with a STEM degree in Psychology and a minor in Biology. He earned his J.D. degree in 2023 from the University of Tennessee, where he served as a member of UT's National Moot Court team and was named the Outstanding Oral Advocate two years consecutively in the National Moot Court Region Seven Championship Round. For his oral advocacy and brief writing on the National Moot Court Team, Mr. Schiller was awarded the American College of Trial Lawyers Medal of Excellence twice, the Center for Advocacy Brief Writing Award twice, and the University of Tennessee College of Law's highest moot court award, the Susan Devitt Moot Court Award.

While in law school, Mr. Schiller received the CALI Award for Excellence for earning the highest grade in both his Trial Practice and Criminal Pretrial Litigation classes, and was inducted into the Order of Barristers honor society for demonstrating excellence in the preparation and presentation of moot appellate argument.

He also worked as a student attorney in the University of Tennessee Law Advocacy Clinic, where he represented low-income individuals in juvenile criminal proceedings and worked to restore disenfranchised voters' rights.

Mr. Schiller resides in the Nashville area with his family. In his personal time, he enjoys photography and rebuilding antique tractors.

PRACTICE AREAS

- Civil Rights
- Class Action
- Cybersecurity Litigation
- Privacy Litigation

- University of Tennessee College of Law's Center for Advocacy Brief Writing Award (2022, 2023)
- Outstanding Oral Advocate, National Moot Court Region 7 Championship (2021, 2022)
- Best Oralist, Ray H. Jenkins Trial Competition Championship (2021)

Membership

- Tennessee Bar Association

PRESENTATIONS, SEMINARS & PUBLISHED WORKS

Presentations

- Schiller, M.M., & Kazanas, S.A. (2019, November). *Social Anxiety and False Memory: New Insights for the Mood Induction Literature*. Poster presented at the 60th Psychonomic Society Annual Meeting, Quebec, Canada.
- Hazleton, S.G., Reeder, A.M., Schiller, M.M., Teece, C.A., Bethke, L.M., Bullion, M.T., & Kazanas, S.A. (2019, May) *Addressing Psychology's Replication Crisis in the Classroom: Students' Quantitative and Qualitative Changes across the Semester*. Poster presented at the 31st Annual Convention of the Association for Psychological Science, Washington, D.C.

Published Works

- Schiller, M.M., & Kazanas S.A. (2019) Selective Attending. In: *Shackelford T., Weekes-Shackelford V. (eds) Encyclopedia of Evolutionary Psychological Science*. Springer, Cham.

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